## **BEFORE THE**

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POSTAL DATE COMPLETION OFFICE OF THE SECRETARY

## POSTAL RATECOMMISSION

# POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

RESPONSES TO INTERROGATORIES
OF UNITED PARCEL SERVICE
BY FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION
WITNESS JOSEPH E. BALL
TO
UPS/FGFSA-T1- 5-7

Maxwell W. Wells, Jr. Maxwell W. Wells, Jr., P.A. P. O. Box 3628 Orlando, Fl 32802 (407) 422-8250

Dated: July 7, 2000

# UPS/FGFSA-T1-5

Does the Postal Service pay contractors providing highway transportation on the basis of the volume of mail carried, or on the basis of the amount of capacity provided?

Response: See response to UPS/FGFSA-T1-4.

## UPS/FGFSA-T1-6

List the principal factors that, in your opinion, prevent the Postal Service from achieving full (i.e., 100 percent) utilization of the highway transportation capacity that it uses.

Response: The Postal Service purchases excess capacity. The method of loading of the vehicles does not maximize utilization of the capacity. The heavy use of containers in the highway transportation vehicles does not permit full utilization.

# UPS/FGFSA-T1 - 7

How, in your opinion, should the costs of unused highway transportation capacity be covered?

Response: To the extent that unused highway transportation capacity is not variable with changes in mail volume, the costs should not be attributed and should be recovered as a part of institutional cost.

## **DECLARATION**

I Joseph E. Ball, declare under penalty of perjury that the answers to the interrogatories UPS/FGFSA-T1-5-7 are true and correct, to the best of my knowledge, information and belief.

Dated, July 7, 2000.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Dated: July 7, 2000.

Maxwell W. Wells, J

Attorney